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R. E. Sigmon Vice President - Regulatory Affairs 201 E. Fourth St., 102 - 320 P. O. Box 2301 Cincinnati, Ohio 45201 Phone: (513) 397-1260

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August 4, 1993 FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Mr. William F. Caton, Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

In the Matter of:

Local Exchange Carriers' Rates,
Terms, and Conditions for
Expanded Interconnection for
Special Access

CC Docket No. 93-162

CC Docket No. 93-162

Dear Mr. Caton:

Enclosed for filing are the original and seven copies of Cincinnati Bell Telephone Company's Motion for Extension of Time to File Direct Case and Rebuttals in CC Docket No. 93-162.

Also provided is a duplicate of this letter and the enclosures. Please date stamp and return this duplicate as acknowledgement of its receipt.

Sincerely,

Enclosures

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'AUG - 4 1993

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of)	
Local Exchange Carriers' Rates, Terms,)	CC Docket No. 93-162
and Conditions for Expanded Interconnection for Special Access)	

MOTION FOR EXTENSION OF TIME TO FILE DIRECT CASE AND REBUTTALS

Cincinnati Bell Telephone Company (CBT) respectfully requests an extension of time to file its direct case in the above-captioned matter. In its Order Designating Issues For Investigation released July 23, 1993,¹ the Common Carrier Bureau (Bureau) directed CBT and other local exchange carriers to file their direct cases on August 13, 1993. In order to compile the voluminous materials necessary to respond fully to the issues identified by the Bureau and provide the requested information, CBT requests an extension until September 14, 1993 to file its direct case.

The Bureau is requesting extensive information from CBT that involves almost every aspect of CBT's business, including network engineering and operations, real estate management, risk management, regulatory affairs, and billing/collection. Further, the

¹<u>Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection for Special Access, Order Designating Issues for Investigation, CC Docket No. 93-162, DA 93-951 (released July 23, 1993) ("Order").</u>

information requested must be presented in a non-standard format with "a complete explanation of how the costs for each item were derived, including relevant worksheets and source listings."²

In addition to the amount of information requested and the degree of coordination among various CBT departments necessary to furnish the information, many of the CBT personnel responsible for gathering the requested data are involved in other Commission proceedings, including the Local Transport tariff filing and CBT's direct case in the 800 data base docket, as well as various state proceedings.

CBT also respectfully requests an extension of 30 days to file rebuttals to oppositions to its direct case. The 10-day period provided for rebuttals is inadequate to respond fully to the numerous parties that can be expected to file oppositions. Because CBT's (and each of the other subject LEC's) special access interconnection tariff provisions are subject to an accounting order, no party could be harmed by a reasonable extension of time.

²Order at p. 10.

CBT recognizes the need for the Bureau to complete its investigation in a timely manner. However, for the reasons stated herein, CBT respectfully requests an extension until September 14, 1993 to present its direct case in this docket and an extension of 30 days to file rebuttals.

Respectfully submitted,

FROST & JACOBS

William D. Baskett III

Thomas E. Taylor

David S. Bence

2500 PNC Center 201 East Fifth Street Cincinnati, Ohio 45202-4182

(513) 651-6800

Attorneys for Cincinnati Bell Telephone Company

Dated: August 4, 1993

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CERTIFICATE OF SERVICE

I, Peggy A. Peckham, do hereby certify on this 4th day of August, 1993, that I have caused a copy of the foregoing Motion for Extension of Time to File Direct Case and Rebuttals of Cincinnati Bell Telephone Company to be mailed via first class United States mail, postage prepaid, to the persons on the attached service list.

Peggy A. Peckham

Kathleen B. Levitz*
Acting Chief, Common Carrier Bureau Federal Communications Commission 1919 M Street, N.W., Room 500 Washington, DC 20554

Francine J. Berry Robert J. McKee Peter H. Jacoby AT&T 295 North Maple Avenue Room 3244J1 Basking Ridge, N.J. 07920

Randall B. Lowe John E. Hoover Jones, Day, Reavis & Pogue 1450 G Street, N.W. Washington, D.C. 20005-2088

Paul R. Schwedler Assistant Chief Regulatory Counsel Defense Information Systems Agency 701 S. Courthouse Road Arlington, VA 22204

Michael L. Glaser Joseph P. Benkert Harsha Krishnan Hooper & Kanouff 1810 Wynkoop Street Suite 200 Denver. CO 80202-1196

James S. Blaszak Francis E. Fletcher, Jr. Gardner, Carton & Douglas 1301 K Street, N.W. Suite 900 - East Tower Washington, D.C. 20005

James B. Gainer
Ann Henkener
Assistant Attorney General
Ohio Public Utilties Commission
180 East Broad Street
Columbus. Ohio 43266-0573

ITS, Inc. *
1919 M Street, N.W., Room 246
Washington, DC 20554

Michael F. Hydock Federal Regulatory Affairs MCI Communication Corp. 1801 Pennsylvania Ave., N.W. Washington, D.C. 20006

Greg Vogt *
Chief, Tariff Division
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, DC 20554

Joseph W. Miller Suite 3600 P. O. Box 2400 One Williams Center Tulsa, Oklahoma 74012

Leon M. Kestenbaum Marybeth M. Banks Sprint Communications Co. 1850 M Street, N.W. Suite 1110 Washington, D.C. 20036

Robert C. Atkinson Senior Vice President Regulatory & External Affairs Teleport Communications Group 1 Teleport Drive, Suite 301 Staten Island, N.Y. 10311

Andrew D. Lipman Nancy L. Rowe Swidler & Berlin 3000 K Street, N.W. Suite 300 Washingotn, D.C. 20007 Heather Burnett Gold President Association for Local Telecommunications Services 1150 Connecticut Avenue, N.W. Suite 1050 Washington, D.C. 20036

* HAND DELIVERY